

## Comeau, Jeremy

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**To:** Comments, Urc  
**Subject:** RE: Enbridge Liquid Pipelines Comments on 170 IAC 5-5, RM 22-03, 811 Law Strawman Draft

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**From:** Ryan Nelson <[Ryan.Nelson@enbridge.com](mailto:Ryan.Nelson@enbridge.com)>  
**Sent:** Friday, September 09, 2022 11:18 AM  
**To:** Comments, Urc <[URCComments@urc.IN.gov](mailto:URCComments@urc.IN.gov)>  
**Cc:** Jim Schott <[Jim.Schott@enbridge.com](mailto:Jim.Schott@enbridge.com)>  
**Subject:** Enbridge Liquid Pipelines Comments on 170 IAC 5-5, RM 22-03, 811 Law Strawman Draft

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Hello,

Overall, we have minimal concerns with the recent draft as some of the changes addressed concerns we initially had. The following concerns either remain or were introduced with this recent draft. I will list the section, then include my comments in red.

### **170 IAC 5-5-2 Notification of violations of IC 8-1-26**

Authority: IC 8-1-26-26  
Affected: IC 8-1-26-21

Sec. 2. (a) ~~Any person or entity may~~ **An operator of a pipeline facility shall report a violation damage to a pipeline facility by providing the pipeline safety division with written or electronic notice of the violation damage within 21 days of becoming aware of the damage unless an extension is approved in writing by the director of the division.**

~~(b) All violations shall be reported to the commission within thirty (30) days of a person becoming aware of the circumstances constituting the violation.~~

**(b) An operator of a pipeline facility shall provide information about a damage within 21 days after notice that a case number has been assigned by the pipeline safety division, unless an extension is approved in writing by the director of the division.**

**(c) a person may report a violation to the pipeline safety division by providing written or electronic notice of the circumstances giving rise to a violation.**

*Our comments: They changed this update from 30 days to 21 days. This should be 30 days to align with monthly reporting. 21 days makes this too frequent. Other centers utilize monthly or quarterly submittals so this is in line with the One Call industry.*

**Sec. 2.2. As used in IC 8-26-20, "either side of the outer limits of the physical plant" means all outer limits of the physical plant, including above, below, and in a full radius surrounding the physical plant.**

*Our Comments: Change the word plant to facility when used throughout this drafted law as plant is not an industry standard term. Facility is utilized across states and is in line with language included in CGA Best Practices.*

Thanks,

**Ryan Nelson** (he/him)

Damage Prevention Program Specialist

**LP Damage Prevention**

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**ENBRIDGE**

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